

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:

JOSEPH GEORGE

Case No. 17-14689-amc
Chapter 13

Deutsche Bank Trust Company Americas f/k/a
Bankers Trust Company, as Trustee for Saxon
Asset Securities Trust 2000-3, Mortgage Loan
Asset Backed Certificates, Series 2000-3,
Movant

vs.

JOSEPH GEORGE,
Debtor

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Deutsche Bank Trust Company Americas f/k/a Bankers Trust Company, as Trustee for Saxon Asset Securities Trust 2000-3, Mortgage Loan Asset Backed Certificates, Series 2000-3 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor(s)' Chapter 13 Plan* (Doc 283), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on July 11, 2017.

2. Movant holds a security interest in the Debtor's real property located at 1335 Passmore Street, Philadelphia, PA 19111 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 50148362 in Official Records of Philadelphia County, Pennsylvania. Said Mortgage secures a Note in the amount of \$30,150.00.

3. The Debtor filed a Motion to Modify Plan Post Confirmation (the “Plan”) on November 8, 2021 (Doc 283).

4. Movant objects to Debtor’s Motion to Modify Plan Post Confirmation because it does not include an Amended Plan.

5. Movant filed a Proof of Claim in this case on August 12, 2018 (Claim No. 13-1).

6. Proof of claim 13-1 is a total debt claim arrears are being paid through the Plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x3017

Facsimile: 704-369-0760

E-Mail: PABKR@brockandscott.com

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor(S)' Chapter 13 Plan has been electronically served or mailed, postage prepaid on November 22, 2021 to the following:

JOSEPH GEORGE
508 SOLLY AVE
PHILADELPHIA, PA 19111-1906

Robert Leite-Young, Debtor's Attorney
6950 Castor Avenue
Philadelphia, PA 19149

KENNETH E WEST, Bankruptcy Trustee
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x3017

Facsimile: 704-369-0760

E-Mail: PABKR@brockandscott.com